

United States District Court  
Northern District of California

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

Case No. 18-cv-06753-PJH

This Document Relates To:  
ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~  
ORDER GRANTING  
ADMINISTRATIVE MOTION TO  
RELATE AND CONSOLIDATE  
CASES FOR PRETRIAL PURPOSES  
AS MODIFIED BY THE COURT**

Pursuant to Civ. L.R. 7-11(a) and 7-12, the undersigned parties hereby stipulate as follows:

**WHEREAS**, on July 27, 2020, the case captioned *Simmons v. Ripple Labs, Inc.*, No. 20-cv-5127-KAW, was transferred to this District from the Southern District of New York, *Simmons*, ECF 16 at 1;

**WHEREAS**, the complaint in *Simmons* involves claims, allegations, and parties that are substantially similar to the operative complaint in *In re Ripple Labs Litigation*;

**WHEREAS**, all the affected parties in both actions—specifically, Defendants Ripple Labs Inc., XRP II LLC, and Bradley Garlinghouse, Lead Plaintiff Bradley Sostack, and Plaintiff Daniel Simmons—hereby stipulate that *Simmons* is related to the putative class action *In re Ripple Labs Litigation* pending before the Court;

**NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Lead Plaintiff Bradley Sostack, Plaintiff Daniel Simmons, and Defendants Ripple Labs, Inc., XRP II LLC, and Bradley Garlinghouse, through their respective counsel, that:

1. The *Simmons* action is related to *In re Ripple Labs Litigation* and, under the Court’s standing order, Dkt. 35 at ¶¶ 6-7, that it should be consolidated therewith.

Dated: August 6, 2020

By: /s/ P. Ryan Burningham  
P. Ryan Burningham (*pro hac vice*)  
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*Counsel for Lead Plaintiff  
Bradley Sostack*

By: /s/ Menno Goedman  
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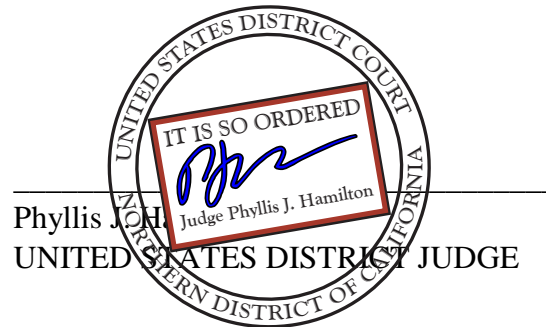
*Counsel for Defendants Ripple Labs, Inc.,  
XRP II LLC, and Bradley Garlinghouse*

By: /s/ Ross E. Pitcoff  
Ross E. Pitcoff  
ROSS PITCOFF LAW  
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New York, NY 10016

*Counsel for Plaintiff  
Daniel Simmons*

Pursuant to the foregoing stipulation, **IT IS SO ORDERED**. The court directs the clerk to take all action prescribed to it under paragraph 7 of this court's March 18, 2019 order regarding publication of notice (Dkt. 35).

Dated: August 21, 2020



Phyllis J. Hamilton  
UNITED STATES DISTRICT JUDGE

**SIGNATURE ATTESTATION**

I, Menno Goedman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized its filing.

By: /s/ Menno Goedman  
Menno Goedman